

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**CHICAGO REGIONAL COUNCIL OF
CARPENTERS PENSION FUND, et al.,**

Plaintiffs,

V.

EXCEL INTERIOR CONSTRUCTION, INC.,

Defendant.

Case No. 08 C 1085

Judge Amy J. St. Eve

Magistrate Judge Mason

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

Raymond J. Sanguinetti declares as follows:

1. I am an associate of the law firm of Whitfield & McGann and am licensed to practice law in the State of Illinois and in the U.S. Dist. Court for Northern District of Illinois, Eastern Division.

2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.

3. I have in excess of 10 years experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to compel compliance with the bonding provisions of the collective bargaining agreement and to collect delinquent employer contributions.

4. Defendant is obligated to pay the attorney fees and court costs incurred by the Plaintiffs pursuant to 29 U.S.C. §1132(g)(1).

5. I have devoted 7.85 hours in connection with this case at the rate of \$165.00 per hour. The total attorney fees billings is \$1,295.25. (See Attached Bill Slips)

6. In addition, the filing fee was \$350.00 and the fee for service of process was an additional \$55.00. These costs total \$405.00.

7. I certify that the attached detailed attorney fees and costs totaling \$1,700.25 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: April 30, 2008

s/ RAYMOND J. SANGUINETTI

Attorney for the Chicago Regional
Council of Carpenters Pension Fund, et
al.

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Slip Listing

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Selection Criteria

Case (hand select) Include: CBOND.N7546/23885
Slip Classification OpenRate Value and Slip Value hidden by Security Rights
Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
349360	TIME			RJS	1.00		
	11/8/2007			Billable	0.00	T@12	
	Billed	G:72395	12/3/2007	CBOND.N7546/23885	0.00		
			Review bond referral. Research Illinois Secretary of State records for corporate information. Prepared bond demand letter. Prepared updates on bond cases for Daniel McAnally and Robert Lid. Diary for suit.		0.00		
349570	TIME			RJS	1.75		
	11/20/2007			Billable	0.00	T@12	
	Billed	G:72395	12/3/2007	CBOND.N7546/23885	0.00		
			Prepared Federal Civil suit for wage and fringe benefit bond; Prepared exhibits; Prepared Federal Summons; Prepared civil cover sheet and appearance; Letter to legal process server.		0.00		
349579	TIME			RJS	0.50		
	11/21/2007			Billable	0.00	T@12	
	Billed	G:72395	12/3/2007	CBOND.N7546/23885	0.00		
			Prepared letter to Robert Lid regarding case status and filing of complaint.		0.00		
350511	TIME			CPW	0.25		
	11/8/2007			Lexis	0.00	A@1	
	Billed	G:72395	12/3/2007	CBOND.N7546/23885	0.00		
			Computer Research Fees/CD ROM		0.00		
354306	TIME			RJS	0.25		
	3/4/2008			Billable	0.00	T@12	
	Billed	G:73139	4/2/2008	CBOND.N7546/23885	0.00		
			Telephone conversation with Carla Sanchez regarding bond compliance. In process.		0.00		
354746	EXP			CPW	1	350.00	350.00
	3/17/2008			\$DC			
	Billed	G:73139	4/2/2008	CBOND.N7546/23885			
			FILING FEE 2/21/08				

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Slip ID	Dates and Time	Posting Status	Description	ATTORNEY Activity	Case Reference	Units DNB Time	Rate Rate Info	Slip Value
						Est. Time	Bill Status	
						Variance		
354806	TIME			RJS		0.25		
3/18/2008				Billable		0.00	T@12	
Billed	G:73139	4/2/2008		CBOND.N7546/23885		0.00		
			Review report of legal process server Scott Forrest Stern & Associates, Inc. on service. Prepared for filing with federal court. Diary default appearance. Review minute order of Judge St. Eve setting status. Telephone conversation with Carla Sanchez, still in process with insurance agent.			0.00		
355323	TIME			DPL		0.25		
3/31/2008				Billable		0.00	T@12	
Billed	G:73139	4/2/2008		CBOND.N7546/23885		0.00		
			Confer with Raymond J. Sanguinetti regarding bond case and request to appear at court in his place.			0.00		
355541	TIME			DPL		1.00		
4/1/2008				Billable		0.00	T@12	
WIP				CBOND.N7546/23885		0.00		
			Prepare for court status/motion hearing; review file for current status; attend status hearing and schedule follow-up status hearing for April 30.			0.00		
355582	TIME			RJS		0.60		
4/1/2008				Billable		0.00	T@12	
WIP				CBOND.N7546/23885		0.00		
			Telephone conversation with Carla Sanchez regarding status of the bond. Prepared letter to Sanchez confirming next status date and issue of attorney fees and costs.			0.00		
357081	TIME			RJS		1.00		
4/30/2008				Billable		0.00	T@12	
WIP				CBOND.N7546/23885		0.00		
			Court Appearance			0.00		
357090	TIME			RJS		1.00		
4/30/2008				Billable		0.00	T@12	
WIP				CBOND.N7546/23885		0.00		
			Prepared affidavit of Robert Lid in support of prove up. Prepared letter to Robert Lid regarding same.			0.00		
357091	TIME			RJS		1.75		
4/30/2008				Billable		0.00	T@12	
WIP				CBOND.N7546/23885		0.00		
			Prepared motion for default judgment; Prepared notice of motion; Prepared certificate of service; Prepared exhibits;			0.00		

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Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
Prepared affidavit of attorney fees; Prepared draft order.				
Grand Total				
	Billable	9.60		
	Unbillable	0.00		
	Total	9.60		

-1.75

7.85 cdf/165.00

\$1295.25